

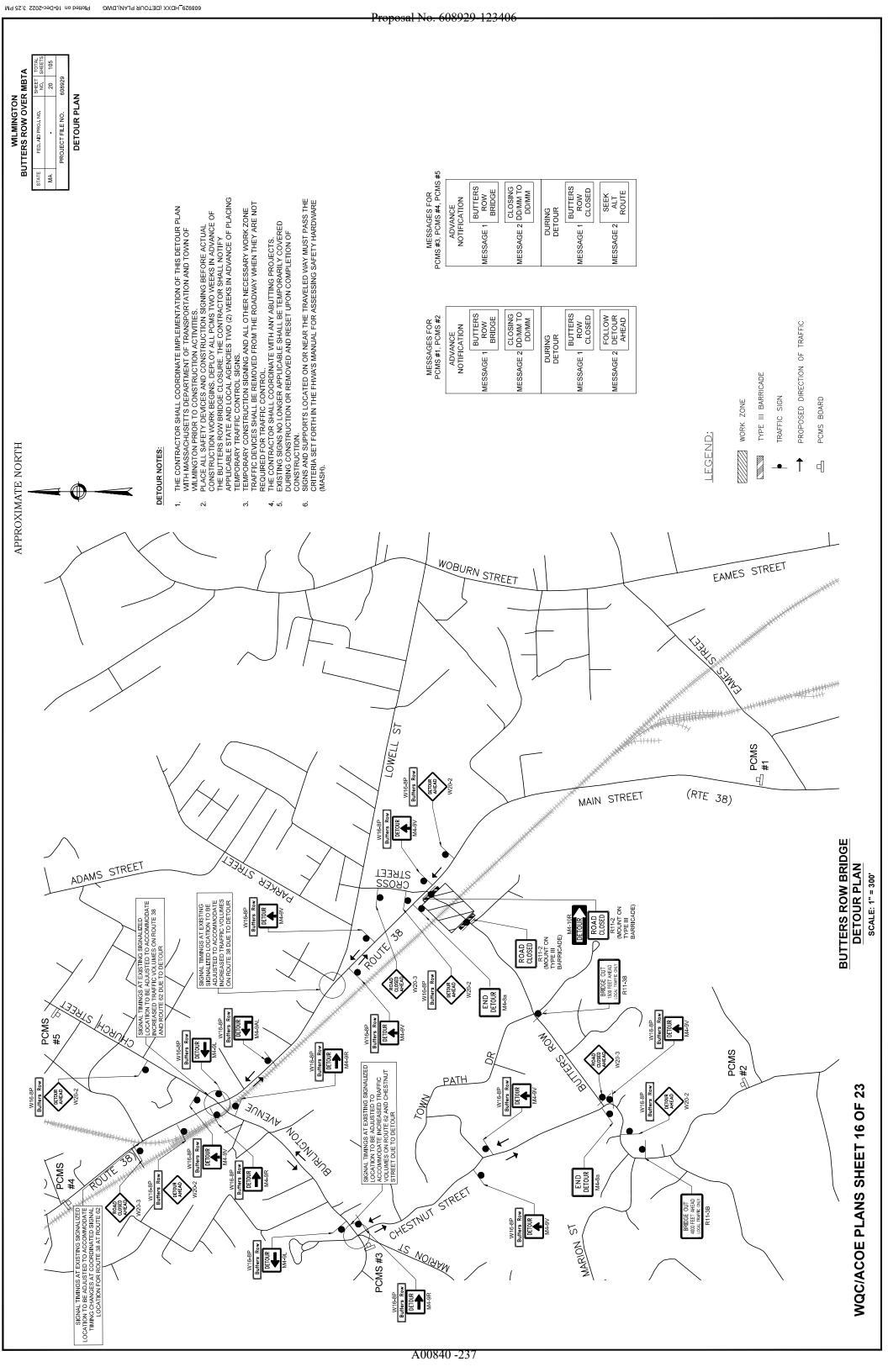
面	WILMINGTON BUTTERS ROW OVER MBTA	- MB	⋖
STATE	FED. AID PROJ. NO.	SHEET NO.	SHEET TOTAL NO. SHEET
MA		16	105
	PROJECT FILE NO.	608929	
	7 11 12 11 10 10 11 11 11 11	1	

DRAINAGE PLAN 1

	REMARKS										
	INV. ELEV. OUT	I=87.10' (PROP. DMH (1-3))	I=87.10' (PROP. DMH (1-3))	I=92.66' (PROP. DMH (1-5))	I=93.50' (PROP, DMH (1-5))	I=98.40' (PROP. DMH (2-2))	I=98.10' (PROP. DMH (2-2))	I=86.80' (PROP. FES (1-9))	I=92.00' (PROP. DMH (1-3))	1=96.00' (РКОР. 5' DIA DMH (2-5))	
DRAINAGE STRUCTURE TABLE	INV. ELEV. IN							I=86.90' (PROP. CB (1-2)) I=86.90' (PROP. CB (1-1)) I=86.90' (PROP. DMH (1-5))	I=92.56' (PROP. CB (1-4)) I=93.00' (PROP. CB (1-8))	I=98.00' (PROP. CB (2-3)) I=98.00' (PROP. CB (2-1))	I=86.50' (PROP. DMH (1-3))
DRAIN	RIM ELEV.	92.06	98.06	60'86	98,25	103.44	103.18	91.06	25.76	103,47	87.75
	OFFSET	13.3 R	13.2 L	15.0 L	14,8 R	15.0 L	15.0 R	9.8 L	13.5 L	5,5 R	39.4 L
	STATION	51+65.39	51+47.42	52+83.57	52+85,28	55+59.71	55+63.15	51+77.20	52+75.89	55+62,17	51+88.08
	NAME/TYPE	PROP. CB (1-1)	PROP. CB (1-2)	PROP. CB (1-4)	PROP. CB (1-8)	PROP. CB (2-1)	PROP. CB (2-3)	PROP. DMH (1-3)	PROP. DMH (1-5)	PROP. DMH (2-2)	PROP. FES (1-9)

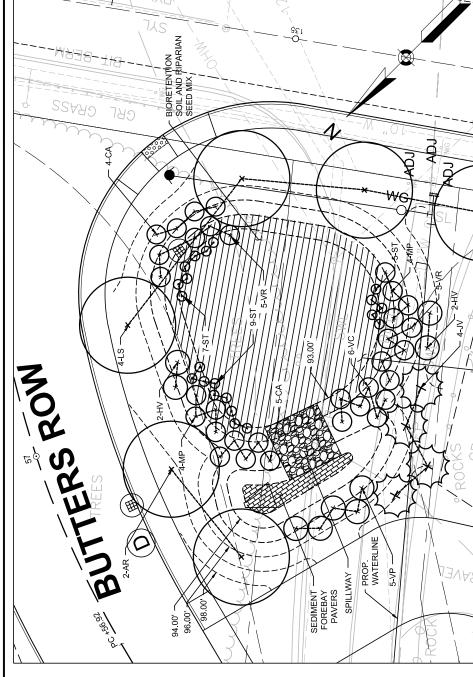
DRAINAGE PLAN 2

PROP. 5' DIA DMH (2-5) 56+74.20 13.5 R 96.39 1=92.60' (PROP. CB (2-4)) 1=92.00' (PROP. CB (2-4)) 1=92.00' (PROP. CB (2-4)) 1=92.00' (PROP. CB (2-6))	INV. ELEV. OUT 40' (PROP. FES (2-7)) (PROP. 5' DIA DMH (2-5)) (PROP. 5' DIA DMH (2-5)) 75' (PROP. FES (2-8))	CONCENTRIC CYLINDRICAL STRUCTURE
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SEDIMENT -FOREBAY PAVERS

PLANTING DESIGN PLAN **BIORETENTION BASIN AT BUT**

TERS ROW

PLANT LIST - BIORETENTION BASIN

1						
	KEY	QTY	BOTANICAL NAME	COMMON NAME	SIZE	ROOT
			DECIDUOUS TREES			
	AR	2	ACER RUBRUM	RED MAPLE	2-2 1/2" CAL	B&B
	ST	4	LIQUIDAMBAR STYRACIFLUA 'HAPDELL'	HAPPIDAZE FRUITLESS SWEET GUM	2-2 1/2" CAL	В&В
			EVERGREEN TREES			
	۸ſ	4	JUNIPERUS VIRGINIANA	EASTERN RED CEDAR	5-6' HT	B&B
			DECIDUOUS SHRUBS			
	CA	6	CORNUS SERICEA	REDOSIER DOGWOOD	2-3' HT	#3 CONT
	HV	4	HAMAMELIS VIRGINIANA	МТСН НАZEL	2-3' HT	#5 CONT
	MP	8	MYRICA PENSYLVANICA	NORTHERN BAY BERRY	2-3' HT	#3 CONT
1	ST	21	SPIREA ALBA VAR. LATIFOLIA	MEADOW SWEET	18-24" HT	#2 CONT
	NC	9	VACCINIUM CORYMBOSUM	BLUEBERRY - HIGHBUSH	2-3' HT	#3 CONT
	ΛP	5	VIBURNUM PRUNIFOLIUM	BLACK HAW VIBURNUM	3-4' HT	#5 CONT
	VR	10	VIBURNUM RECOGNITUM	NORTHERN ARROWWOOD	2-3' HT	#3 CONT

#3 CONT. #5 CONT.

2-3 FEET HT

BERRY

NORTHERN BAY WITCH HAZEL

HAMAMELIS VIRGINIANA DECIDUOUS SHRUBS
MYRICA PENSYLVANICA

> 4 4

> MΡ ⋛

2-3' HT

B&B B&B

5-6' HT 5-6' HT

EASTERN RED CEDAR

JUNIPERUS VIRGINIANA **EVERGREEN TREES**

PICEA GLAUCA

4

7

 \geq В

WHITE SPRUCE

ROOT

SIZE

LAND

PLANT LIST - UPL

COMMON NAME

B&B

2-2 1/2" CAI

RED MAPLE

DECIDUOUS TREES **BOTANICAL NAME**

ΩT

ΚĒΥ

ACER RUBRUM

 AR

PLANTING DESIGN PLAN S ROW **UPLAND BUTTER**

1-AR	4-MP	4-PG	R&D EXIST PAVEMENT	ANDSCATE OF THE STATE OF THE ST	Rocks (&)
WE ACCOUNT OF THE PROPERTY OF	PT +95.54	N A		Post Post Post Post Post Post Post Post	10 20 30 40 100-FOOT WETL SCALE: 1" = 10" BUFFER ZONE

PLANTING NOTES

- 1. CONTRACTOR SHALL HAVE ALL SUBSURFACE UTILITIES
 MARKED PRIOR TO THE START OF WORK.
 2. PLANT LOCATIONS ARE APPROXIMATE. PRIOR TO
 PLANTING, LOCATION OF ALL PLANT MATERIAL WILL BE
 APPROVED BY THE RESIDENT ENGINEER AND THE
 LANDSCAPE ARCHITECT.
 3. ALL PLANT MATERIAL WILL HAVE TAGS INDICATING
 COMMON NAME. BOTAMICAL NAME. CULTIVAR, & SIZE.
 4. IMMEDIATELY AFTER ACCEPTANCE OF PLANTING, TAGS
 AND RIBBONS SHALL BE REMOVED.
 5. ALL PLANTS WILL BE MULCHED PER PLANS AND
 SPECIFICATIONS.
 6. ALL SHRUB AND PERENNIAL BEDS WILL BE WEEDED AND
 OTHERWASE NEATLY MAINTAINED FOR THE DURATION OF
 THE CONTRACT.
 7. ALL PROPOSED PLANT MATERIAL AND SEED MIXES SHALL
 BE WATERED AS PER SPECIAL PROVISIONS.

WQC/ACOE PLANS SHEET 17 OF 23

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FILTER TUBE & COIR FIBER ROLI SEDIMENT CONTROL BARRIERS - COMPOS

WQC/ACOE PLANS SHEET 18 OF 23

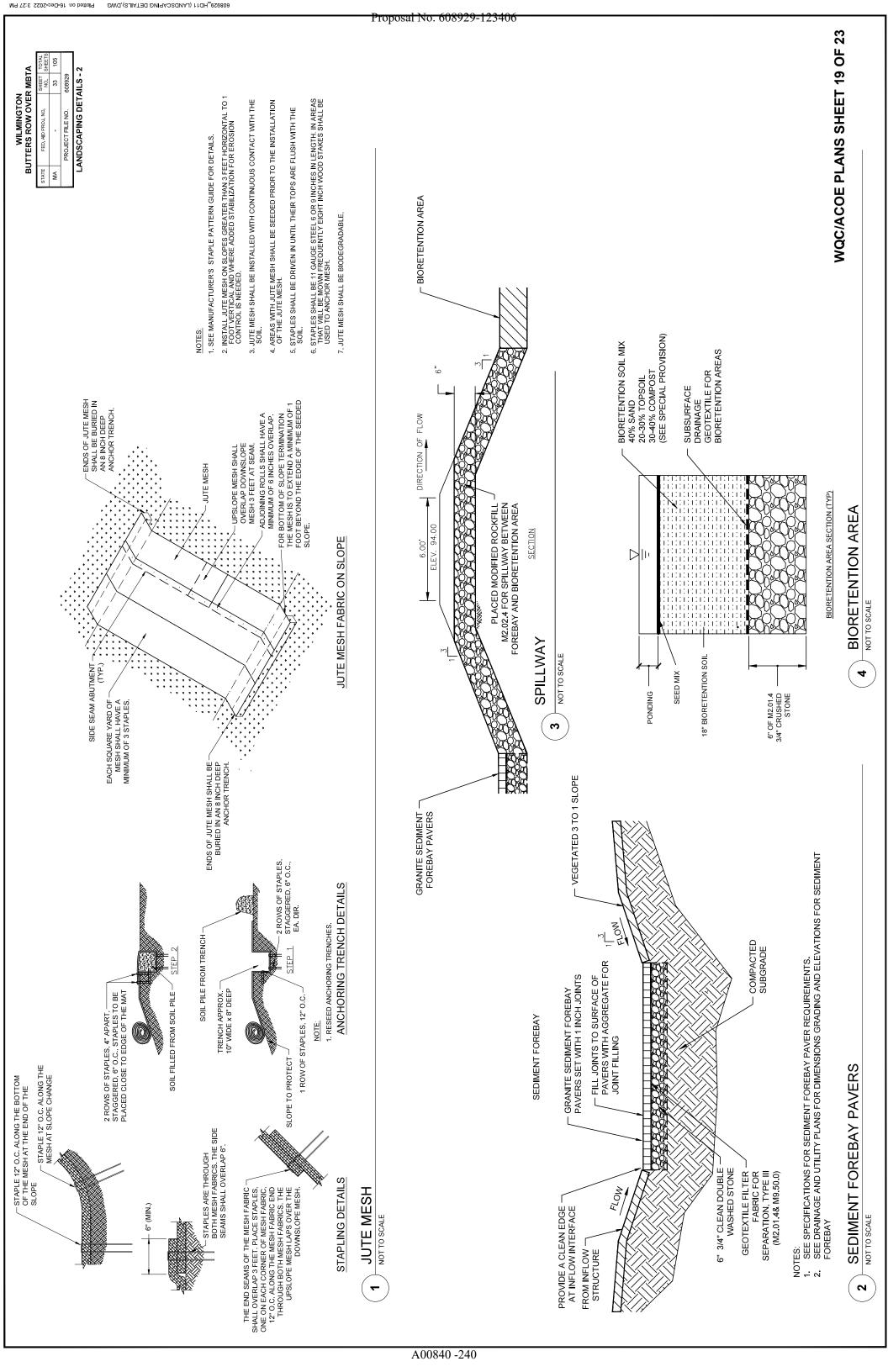
TREE PROTECTION

NOT TO SCALE

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NOT TO SCALE

NOT TO SCALE _



5	DOLLERS NOW OVER MID IA		(
STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
MA	-	34	105
	PROJECT FILE NO.	608929	
-	ANDSCADING DETAILS - 3	٥	۳,

LANDSCAPING DETAILS - 3

WATERING SAUCER SHALL BE FLOODED TWICE DURING THE FIRST 24 HOURS AFTER PLANTING

TREE SHALL BE SET PLUMB

DO NOT CUT LEADER

3 INCHES AGED PINE BARK MULCH (PULL MULCH AWAY FROM TRUNK OF TREE) BACKFILL MIX PER SPECIFICATIONS

3 INCH HIGH EARTH WATERING SAUCER AROUND TREE PIT

TREE SHALL BE PLANTED SO THAT CROWN IS 3 INCHES ABOVE FINISHED GRADE AFTER SETTLEMENT

CUT & ROLL BACK 1/3 OF BURLAP BEFORE BACKFILLING. COMPLETELY REMOVE SYNTHETIC BURLAP & LACING

ROOTBALL SHALL BE PLACED ON UNDISTURBED SUBGRADE ROOTBALL

6 INCHES BELOW ROOTBALL

EVERGREEN TREE PLANTING

MIN. 2 X ROOTBALL DIAMETER

NOT TO SCALE

TREE SHALL BE PLANTED SO THAT CROWN IS 2-3 INCHES ABOVE FINISHED GRADE AFTER SETTLEMENT WATERING SAUCER SHALL BE FLOODED TWICE WE DURING THE FIRST 24 HOURS AFTER PLANTING DO NOT CUT LEADER

TREE SHALL BE SET PLUMB

3 INCHES AGED PINE BARK MULCH (PULL MULCH AWAY FROM TRUNK OF TREE)

3 INCH HIGH EARTH WATERING SAUCER AROUND TREE PIT

CUT & ROLL BACK 1/3 OF BURLAP BEFORE BACKFILLING. COMPLETELY REMOVE SYNTHETIC BURLAP & LACING EXCAVATE PLANTING PIT TO DEPTH OF ROOT BALL With Stope and

EVERGREEN TREE PLANTING (SLOPE) 2

NOT TO SCALE

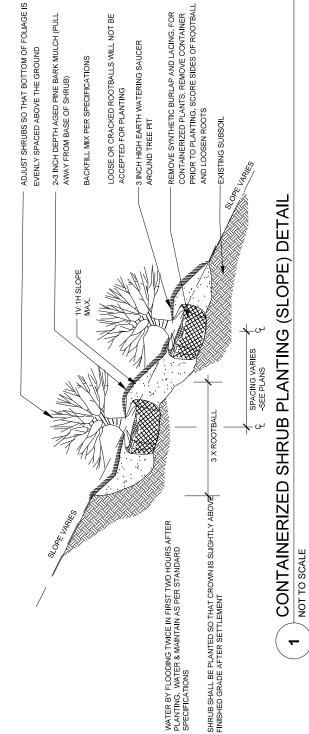
MIN. 2 X ROOTBALL DIAMETER

ROOTBALL

BACKFILL MIX PER SPECIFICATIONS

NOT TO SCALE 4

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PLANTABLE BACKFILL MIX PER SPECIAL PROVISIONS 3 INCH HIGH EARTH WATERING SAUCER AROUND TREE PIT 2-3 INCHES AGED PINE BARK MULCH (PULL MULCH AWAY FROM TRUNK OF TREE) CUT & ROLL BACK 1/3 OF BURLAP BEFORE BACKFILLING. COMPLETELY REMOVE SYNTHETIC BURLAP & LACING TREE SHALL BE PLANTED SO THAT CROWN IS 3 INCHES ABOVE FINISHED GRADE AFTER SETTLEMENT WATERING SAUCER SHALL BE FLOODED TWICE DURING THE FIRST 24 HOURS AFTER PLANTING BE USED TREE SHALL BE SET PLUMB TREE WRAP SHALL NOT

ROOTBALL SHALL BE PLACED ON UNDISTURBED SUBGRADE 3 X ROOTBALL DIAMETER 6 INCHES BELOW ROOTBALL

TREE PLANTING

NOT TO SCALE က

WATER BY FLOODING TWICE IN FIRST TWO HOURS AFTER PLANTING. WATER & MAINTAIN AS PER STANDARD SPECIFICATIONS PLANT TO BE 2 INCHES MIN. ABOVE FINISHED GRADE AFTER SETTLING CROWN OF AND BACKFILL WITH PLANTING MIX EXCAVATE TO REQUIRED DEPTH SHRUBS SHALL BE SET PLUMB

PLANTABLE BACKFILL MIX PER SPECIAL PROVISIONS 2-3 INCH DEPTH AGED PINE BARK MULCH (PULL 3 INCH HIGH EARTH WATERING SAUCER AWAY FROM BASE OF SHRUB) AROUND PLANTING BED <u>N</u>

LACING. FOR CONTAINERIZED PLANTS, REMOVE
LACING. FOR CONTAINERIZED PLANTS, REMOVE
CONTAINER PRIOR TO PLANTING. SCORE SIDES OF
CONTAINER AND LOOSEN ANY ROOTS ENCIRCLING
THE ROOT BALL LOOSE OR CRACKED ROOTBALLS WILL NOT BE ACCEPTED FOR PLANTING UNDISTURBED SUBGRADE ROOTBALL BELOW ROOTBALL

SHRUB PLANTING 3 X ROOTBALL

4. NOTE: REFER TO SPECIFICATIONS FOR MATERIAL REQUIREMENTS ROCK TRENCH SEE NOTE - 6" MIN. BELOW GRADE EXCAVATION OF UNSUITABLE MATERIAL GRAVEL BORROW EARTH TRENCH 3" MIN.-

NOTE: FURNISH AND INSTALL CLOSED CELL GLASS INSULATION. 2" THICK FOAMGLASS ONE BY PITTSBURG CORNING OR EQUAL, WITH PITTWRAPP AA JACKETING BY PITTSBURG CORNING OR EQUAL WHEN WATER MAIN CANNOT BE INSTALLED AT OR BELOW THE REQUIRED BURIAL DEPTH OF FIVE (5) FEET BELOW GRADE.

EXIST PAVEMENT (TYP.)

SUBBASE

///EXIST.

GRAVEL BORROW

15"

EXIST SUBBASE

UNDISTURBED MATERIAL (TYP.)

H SIDES (TYP.)

CUT

SAW

-TACK COAT (TYP.)

2" THICK TYPE I-1 BIT.CONC.TOP COURSE 2" (MIN.) THICK TYPE I-1 BIT CONC. BINDER COURSE

PERMANENT PAVING TO BE USED IN ALL AREAS OF MILL AND OVERLAY.
MATERIALS SHALL MATCH CORRESPONDING FULL DEPTH SECTION. REFER
TO TYPICAL ROADWAY SECTIONS.
 HMA FOR PATCHING TO BE USED IN AREAS OF FUTURE FULL DEPTH
CONSTRUCTION.

WATER TRENCH SECTION NOT TO SCALE

THICKNESS OF PAVEMENT SHALL MEET THICKNESS OF EXISTING PAVEMENT BUT IN NO CASE LESS THAN 4". THE CONTRACTOR SHALL MAINTAIN TEMPORARY PAVEMENT FOR A MINIMUM OF 90 DAYS EXCEPT IF TEMPORARY PAVEMENT IS PLACED AFTER OCTOBER 1ST, THEN IT SHALL BE MAINTAINED UNTIL APRIL 15 OF THE FOLLOWING YEAR.

CONTRACTOR SHALL MEET EXISTING ROADWAY GRADES.

THE CONTRACTOR SHALL MEET EXISTING ROADWAY GRADES.

THE CONTRACTOR SHALL MEET EXISTING ROADWAY GRADES.

THE CONTRACTOR SHALL MEET EXISTING ROADWAY GREADY-MIX FLOWABLE FILL MAY BE REQUIRED BY THE CITY OF CAMBRIDGE DPW OR WATER DEPARTMENT FOR TRENCH BACKFILLING AND PATCHING IN THE STREET.

READY-MIX FLOWABLE FILL SHALL BE USED AS DIRECTED BY THE CITY OF CAMBRIDGE AND SHALL BE PROVIDED AT NO ADDITIONAL COST TO THE OWNER. w 4 - 0

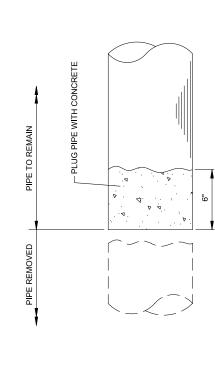
NOTES:

TRENCH WIDTH
APPROVED BACKFILL
MATERIAL PER
SPECIFICATIONS OR
ORDINARY BORROW

TEMPORARY TRENCH PATCH DETAIL

NOT TO SCALE

LIMIT OF EXCAVATION VARIES



EXIST. PAVEMENT (TYP.)

FACK COAT (TYP.)

2" (MIN.) THICK TYPE I-1 BIT CONC. BINDER COURSE 2" THICK TYPE I-1 BIT.CONC.TOP COURSE

EMULSION (TYP.)-

-SAW CUT BOTH SIDES (TYP.)

WELL BORROWS S

COMPA

771

TRENCH WIDTH
APPROVED BACKFILL
MATERIAL PER
SPECIFICATIONS OR
ORDINARY BORROW

ETAIL

PERMANENT TRENCH PATCH D

UNDISTURBED MATERIAL (TYP.)

NOT TO SCALE

WQC/ACOE PLANS SHEET 21 OF 23

TYPICAL PIPE PLUGGING DETAII

NOT TO SCALE

1-1/2"

5' COVER MINIMUM UNLESS OTHERWISE SPECIFIED OR APPROVED. SEE NOTE

GRAVEL BORROW

™2 N=1

6" MIN

√ 12" MIN.

ALL ROCK EXCAVATION AND STONES LARGER THAN 3" SHALL BE DISPOSED OF AND REPLACED WITH APPROVED EXCAVATED MATERIAL OR GRAVEL BORROW.

APPROVED BACKFILL

GRAVEL BASE COURSE, SEE SPECIFICATIONS

COMPACTED 3/4" DIA. CRUSHED STONE BEDDING

8

1/2 O.D.

SHEETING IF USED

UNDISTURBED SUBGRADE

O.D. + 3

MINIMUM TRENCH WIDTH(W) =

TYPICAL PIPE TRENCH

NOT TO SCALE

NOTE

EXCAVATION-EARTH OR ROCK

EXISTING PAVEMENT

PAVEMENT, SEE HMA PATCH DETAILS

EXISTING PAVEMENT ¬

SAW CUT EDGES TO OBTAIN CLEAN FULL THICK BUTT JOINT ON EXISTING BASE AND REMOVE BROKEN PAVEMENT AND GRAVEL TO PROVIDE STRAIGHT EDGE

SEAL JOINTS BETWEEN NEW AND EXIST. BIT. PAVEMENT W/2 TACK COATS OF EMULSIFIED ASPHALT

– SUITABLE EXISTING MATERIAL OR SUITABLE ORDINARY FILL THOROUGHLY COMPACTED

PROP. PIPE

TRENCH WIDTH = D+2 (3"-0" MIN)

2" HMA BINDER COURSE

TEMPORARY PAVING

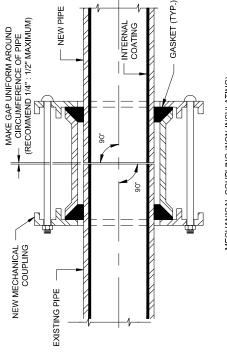
PERMANENT PAVING

REFER TO HIGHWAY PLANS FOR SURFACE MATERIALS. SEE NOTE.

6" MIN

EXIST. BIT. CONC. ROADWAY

STANDARD VALVE BOX AND COVER NOT TO SCALE



MECHANICAL COUPLING (NON-INSULATING)

NOTES:

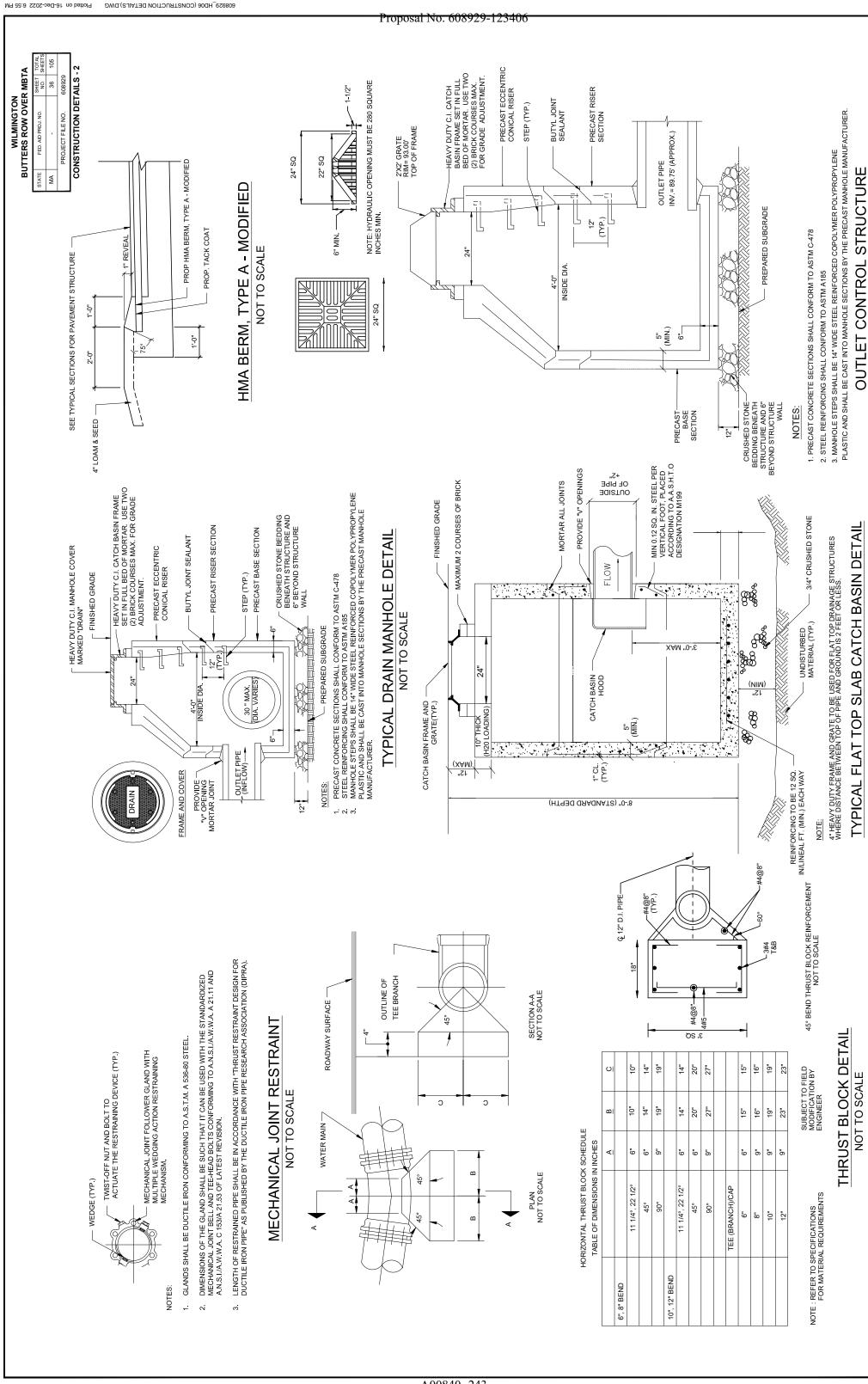
- CONTRACTOR TO VERIFY OUTSIDE DIAMETER OF ALL EXISTING AND PROPOSED PIPES FOR SIZING COUPLINGS.
 - TRANSITION COUPLINGS WITH LARGER GASKETS OR REDUCING MIDDLE RINGS AS REQUIRED BY MANUFACTURER TO SPAN PIPES WITH DIFFERENT SIZE OUTSIDE DIAMETERS. A REDUCING MIDDLE SHALL BE USED AT LOCATIONS WHERE OUTSIDE DIAMETERS DIFFER BY 1-INCH OR MORE.

 MECHANICAL COUPLINGS AND ALL HARDWARE SHALL BE COMPLETELY WRAPPED WITH WAX-TAPPE COATING SYSTEM.

 MECHANICAL COUPLINGS AND ALL HARDWARE SHALL BE INSTALLED AND TESTED AS PER MANUFACTURER'S STANDARDS AND INSTALLATION GUIDELINES.

MECHANICAL COUPLINGS NOT TO SCALE

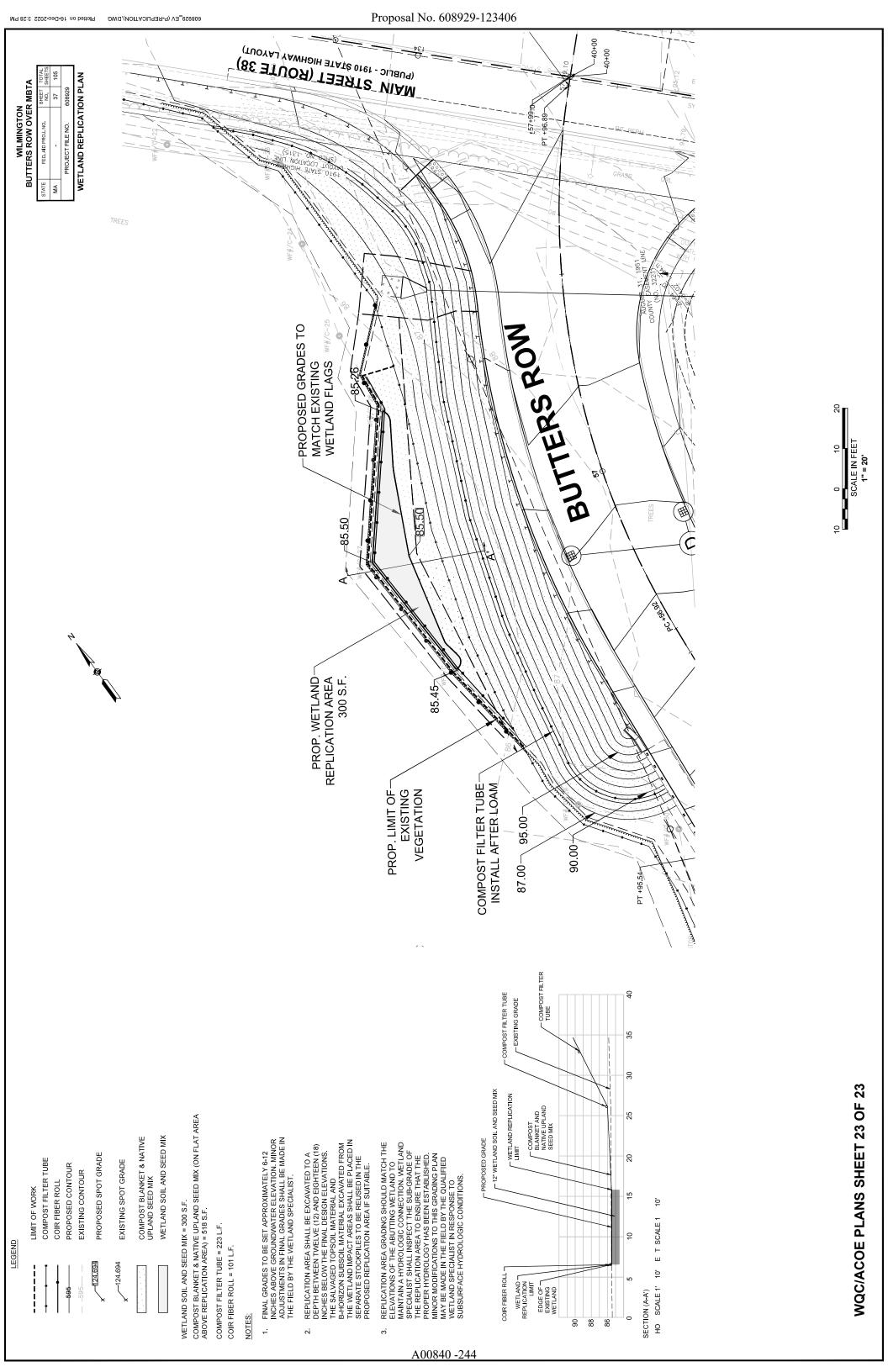
EMULSION (TYP.)



NOT TO SCALE

NOT TO SCALE

WQC/ACOE PLANS SHEET 22 OF 23



May 10, 2023

To: Heidi Davis, MassDEP (heidi Davis (heidi Davis (heidi Davis (heidi Davis (<a

Tyler Lewis, MassDEP (Tyler.Lewis@mass.gov)

Cc: Melissa Lenker, MassDOT (<u>melissa.lenker@state.ma.us</u>)

Cori Beckwith, MassDOT (corinna.beckwith2@state.ma.us)

From: Danielle Spicer, P.E., Green International Affiliates, Inc.

Date: May 10, 2023

Project Name: Bridge Replacement (W-38-003) Butters Row over MBTA

Wilmington, MA MassDOT Project 608929

Project Number: Green No. 21058.XX

Subject: Response to MassDEP Administrative Completeness and Technical Deficiency

Letter for 401 WQC Application No: 23-WW11-0002-APP

This memorandum provides the additional details in response to DEP's Administrative Completeness and Technical Deficiency email dated 4/19/2023 for 401 WQC Application No: 23-WW11-0002-APP.

For reference, the history of the communication of the subject matter between MassDOT Environmental and MassDEP is provided below with our responses noted in **BOLD**:

1. On April 12, 2023 MassDOT Environmental responded to the original Administrative Completeness and Technical Deficiency letter, dated April 7, 2023, with regards the suggestion to further reduce the project limits by removing one of the sidewalks along Butters Row within the project limits with the following details:

The project's main purpose is to provide a safe and improved crossing of Butters Row over the MBTA tracks, which is currently structurally deficient and functionally obsolete, as well as to improve the multimodal accommodations along the project corridor. Another upcoming MassDOT Project No. 608051 (Reconstruction on Route 38), incorporates elements of "Complete Streets" along Route 38 and its major intersections, which includes the intersection of Route 38 and Butters Row subject to this WQC Application. The side street approaches at this intersection are proposed to be realigned to provide improved sight distances and geometry, which are currently causing safety concerns for all roadway users. Both projects are intended to incorporate the "Complete Streets" elements to improve pedestrian and bicyclists' safety, connectivity with pedestrian and bicycle accommodations proposed as part of the adjacent Route 38 project, as well as to improve site visibility.

Therefore, in order to enhance the overall safety along both Butters Row and Route 38 for all roadway users including bicyclists, pedestrians, and vehicles, the proposed design requires providing two sidewalks on both sides of Butters Row. Impacts to adjacent resource areas were minimized to the maximum extent practical by the proposed

retaining wall on the north side of Butters Row and stormwater is mitigated with a proposed bioretention basin for the eastern portion of the project.

2. On April 19, 2023, MassDOT Environmental received the additional response from MassDEP with the following details:

Thank you for your response of April 12th and the reference to MassDOT's Complete Streets Program. We understand that the project's main purpose is to provide and safe and improved crossing of Butters Row over the MBTA tracks. MassDEP also acknowledges that this project qualifies as a redevelopment project. As described in the application, the entire project is within a Zone II; Standard 6 of the stormwater standards requires that any project discharging to a Zone II area shall receive the highest and best practical method of treatment. Given that the proposed project will increase impervious area by approximately 61 percent and will have a TSS removal rate of approximately 40 percent, the project, as proposed, does not appear to do provide the appropriate level of treatment.

Our request to evaluate a single-sidewalk alternative was intended to guide the project towards decreasing impervious areas so as to better meet the MEP standard. If this alternative is not possible, then an evaluation of possible locations for Stormwater Control Measures (SCMs) and Low Impact Development (LID) techniques must include sufficient detail to determine why each SCM or LID technique was not feasible or practicable at each location. This includes an evaluation of subsurface measures and off-site mitigation, as applicable, to be a complete evaluation.

In addition, there is a discrepancy in the stated increase in impervious area. The narrative notes that impervious area will increase by 23,109 square feet while Table 9 indicates that there will be 30,202 square feet. Also, there appears to be a discrepancy within Table 9, as well, as the totals for existing and proposed impervious area are the same, and the net impervious numbers do not add up to the total. These numbers should be clarified and water quality data adjusted accordingly.

In response the above concerns expressed by DEP, the following additional evaluation details are provided below:

The proposed project will result in a net increase of 20,202 SF. This number is correctly noted in all the calculations, but was incorrectly noted in the narrative and Table 9. We have updated both the narrative and Table 9 and included an updated PDF of the report to reflect this.

The project will treat 17,703 SF of impervious area within the proposed BMP, which is approximately 88% of the net increase of impervious area. Removal of one side of the sidewalk accounts for a range of 4,150 – 4,350 SF (use 4,250 SF for average) depending on which side is removed. The proposed BMP is treating approximately 55% of both sides of the sidewalk. Removal of one side of the sidewalk would only result in a reduction of approximately 1,900 SF of non-treated impervious area from the project. This amount is very minimal and the public safety improvements and benefits of providing a sidewalk on both sides of the roadway outweigh removing one side of the sidewalk.

Other locations within the project limits were reviewed for additional stormwater treatment and are summarized below:

- West of the bridge, there are steep slopes immediately adjacent to both sides of Butters
 Row that extend down to the ROW limits preventing installation of stormwater BMPs. In
 addition, there is a gravel access road to the MBTA railroad that is located between
 Butters Row and the large wetland system to the north that needs to be maintained.
- Consideration was also given to installing stormwater mitigation BMPs west of the bridge along the south side of Butters Row; however, there is a two-story house located just west of the intermittent stream and the steep slopes in this area prevent installation of a stormwater BMP.
- There is a small upland area near the vegetated wetland C-series west of the bridge across from Butters Row/Factory Road intersection. This area was considered for stormwater mitigation; however, construction of a stormwater BMPs at this area was not found practicable because this area has multiple mature trees (see Photo 1 below), which serve as a natural buffer to the adjacent wetland. Removal of these mature trees so close to the wetland system could result in negative impacts to it. In addition, the area is likely to have a high groundwater table, since it is immediately adjacent to the wetland area C-series with standing water surrounding the intermittent stream (see Photo 2 below). The proposed drainage that discharges in this area includes catch basins with deep sumps and hoods and will provide a min. of 25% TSS removal. In addition, runoff over this vegetated area with mature tress will provide some treatment as well. Therefore, the removal of these mature trees and disturbance to this area in order to install a small stormwater BMP was not found as a practical alternative.



Photo 1: View looking north from the Butters Row/Factory Road intersection



Photo 2: View of Vegetated Wetland C-series at the location of the intermittent stream (inlet)

In addition, 400-feet of approach retaining walls were added to the project to minimize environmental impacts on the project.

To conclude, the additional sidewalk is providing necessary safety improvements and overall public benefit, and its removal is not practical with regards to the small amount of impervious area to be reduced by its removal, as demonstrated above. Multiple areas throughout the project site were considered; however, given the constraints noted above, were deemed either impracticable or infeasible. The project, as a whole, is providing stormwater mitigation to the maximum extent practicable.